

PHILLIP A. TALBERT  
United States Attorney  
KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
APPROXIMATELY \$25,000.00 IN  
U.S. CURRENCY,  
  
Defendant.

CASE NO. 1:22-MC-00035-JLT

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Jesus Pedro Maldonado Ceja (“claimant”), by and through their respective counsel, as follows:

1. On or about December 1, 2021, claimant filed a claim in the administrative forfeiture proceedings with the Federal Bureau of Investigation with respect to the Approximately \$25,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on September 2, 2021.

2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the  
3 parties. That deadline was March 1, 2022.

4 4. By Stipulation and Order filed March 4, 2022, the parties stipulated to extend to May 2,  
5 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant property and/or to obtain an indictment alleging that the defendant property is subject to  
7 forfeiture.

8 5. By Stipulation and Order filed April 26, 2022, the parties stipulated to extend to July 31,  
9 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant property and/or to obtain an indictment alleging that the defendant property is subject to  
11 forfeiture.

12 6. By Stipulation and Order filed July 29, 2022, the parties stipulated to extend to September  
13 29, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
14 defendant property and/or to obtain an indictment alleging that the defendant property is subject to  
15 forfeiture.

16 7. By Stipulation and Order filed September 29, 2022, the parties stipulated to extend to  
17 November 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
18 against the defendant property and/or to obtain an indictment alleging that the defendant property is  
19 subject to forfeiture.

20 8. By Stipulation and Order filed November 29, 2022, the parties stipulated to extend to  
21 December 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
22 against the defendant property and/or to obtain an indictment alleging that the defendant property is  
23 subject to forfeiture.

24 9. By Stipulation and Order filed December 21, 2022, the parties stipulated to extend to  
25 January 27, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
26 against the defendant property and/or to obtain an indictment alleging that the defendant property is  
27 subject to forfeiture.

28 ///

10. By Stipulation and Order filed January 27, 2023, the parties stipulated to extend to February 27, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the defendant property and/or to obtain an indictment alleging that the defendant property is subject to forfeiture.

11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to April 28, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

12. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to April 28, 2023.

Dated: February 22, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

Dated: February 22, 2023

/s/ Julissa Echevarria  
JULISSA ECHEVARRIA  
ROBERT L. FORKNER  
Attorneys for potential claimant  
Jesus Pedro Maldonado Ceja  
(As approved by telephone on 2/22/23)

IT IS SO ORDERED.

Dated: **February 22, 2023**

  
UNITED STATES DISTRICT JUDGE